

1 RENE L. VALLADARES
Federal Public Defender
2 State Bar No. 11479
MONIQUE KIRTLEY
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Monique_Kirtley@fd.org

6 Attorney for Ronald Harris

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**
9

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 RONALD HARRIS,

14 Defendant.

Case No. 2:09-cr-223-GMN-LRL

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(Second Request)

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16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
17 United States Attorney, and Robert Knief, Assistant United States Attorney, counsel for the
18 United States of America, and Rene L. Valladares, Federal Public Defender, and
19 Monique Kirtley, Assistant Federal Public Defender, counsel for Ronald Harris, that the
20 Revocation Hearing currently scheduled on August 11, 2016, be vacated and continued to a
21 date and time convenient to the Court, but no earlier than ninety (90) days.

22 This Stipulation is entered into for the following reasons:

- 23 1. The defendant is in custody and does not oppose the continuance.
24 2. On January 19, 2016, Mr. Harris was indicted for possession with intent to
25 distribute, in case number 2:16-cr-014-GMN-CWH.
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1 3. On May 25, 2016, a motion to suppress was filed in case number 2:16-cr-014-
2 GMN-CWH. An evidentiary, on the motion to suppress, was conducted on May 25, 2016. On
3 June 30, 2016, the Magistrate Judge entered a Report and Recommendation. (CR#17). The
4 Objections are currently due on August 31, 2016.

5 4. The revocation hearing on case 2:09-cr-223-GMN-LRL is currently scheduled
6 for August 11, 2016. The revocation petition is inextricably linked to case 2:16-cr-014-GMN-
7 CWH, which is currently scheduled for trial on September 06, 2016. The criminal indictment
8 and the revocation petition allege the same criminal conduct.

9 5. The additional time requested herein is not sought for purposes of delay, but
10 merely to allow for the complete resolution of the pretrial motions process, prior to the hearing
11 on the revocation petition.

12 This is the second request for a continuance of the revocation hearing.

13 DATED this 5th day of August, 2016.

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15 RENE L. VALLADARES
16 Federal Public Defender

 DANIEL G. BOGDEN
 United States Attorney

17 /s/ *Monique Kirtley*
18 By _____
19 MONIQUE KIRTLEY
 Assistant Federal Public Defender

 /s/ *Robert Knief*
 By _____
 ROBERT KNIEF
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 RONALD HARRIS,

7 Defendant.

Case No. 2:09-cr-223-GMN-LRL

ORDER

9
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for
11 Thursday, August 11, 2016 at 9:30 a.m., be vacated and continued to November 17, 2016 at
12 the hour of 9:30 a.m.; or to a time and date convenient to the court.

13 DATED this 8 day of August, 2016.

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16 UNITED STATES DISTRICT JUDGE
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